

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

\*\*\*\*\*  
DISABILITY RIGHTS CENTER-NH, \*  
Plaintiff \*  
\*  
v. \* Civil No. 18-cv-160-LM  
\*  
HELEN HANKS, in her official capacity as \*  
Commissioner of the New Hampshire \*  
Department of Corrections, and MICHAEL A. \*  
ZENK, in his official capacity as Warden of \*  
the New Hampshire State Prison for Men \*  
Defendants \*  
\*\*\*\*\*

**AFFIDAVIT OF LINDSEY B. COURTNEY**

I, Lindsey B. Courtney, being duly sworn hereby depose and state as follows:

1. I am an attorney in the civil bureau of the New Hampshire Office of the Attorney General, assigned to work on the above-entitled matter.
2. On March 15, 2018, the defendants provided the plaintiff with a CD containing 2595 pages of records.
3. On March 20, 2018, the defendants provided the plaintiff with a CD containing an additional 125 pages of records.
4. The defendants have been diligently working to identify any remaining DOC records regarding this matter. Upon information and belief, there are only two remaining records at DOC that have not been provided to the plaintiff. These records were made at the direction of the State Police as part of a Major Crimes Investigation.
5. Counsel for the defendants is currently working with counsel for State Police to try to obtain these records. Should these records be deemed to belong to DOC and not State Police, they will be produced to the plaintiff.

6. The defendants do not anticipate that they will create records in the future regarding this matter, with the exception of some Quality Assurance records. The defendants agree that any future records involving this matter will be produced to the petitioner as they are available.

I declare that the foregoing is true and correct and based on my personal knowledge.

Dated: March 23, 2018

/s/Lindsey B. Courtney  
Lindsey B. Courtney